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ASSOCIATES,  
INC.

Geoenvironmental Engineering and Technologies

COLSF 7.3 V1

Received

JUN 08 1992

June 4, 1992

SUPERFUND BRITANNIA

Mr. Neil Thompson  
U.S. Environmental Protection Agency  
Park Place Building  
1200 Sixth Avenue  
Seattle, WA 98101

**RE: RESPONSE TO EPA AND ECOLOGY COMMENTS  
COLBERT LANDFILL PHASE II QUALITY ASSURANCE PROJECT PLAN**

Dear Mr. Thompson:

Spokane County has reviewed the comments on the Colbert Landfill Phase II Quality Assurance Project Plan (QAPjP) prepared by the U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) and submitted in your April 13, 1992 letter. The majority of the comments relate to the lack of specificity for certain QAPjP components, primarily aspects related to NPDES monitoring requirements. Because many of the NPDES issues have not been resolved, these comments cannot be addressed at this time. As a result, Spokane County requests that response to QAPjP comments, and revision of the QAPjP, be delayed until the NPDES issues are resolved.

As stated in EPA's comment letter, Phase II design is not dependent on approval of the QAPjP. However, Phase II well construction (tentatively scheduled to start this summer) is peripherally impacted. A number of comments in the April 13 letter relate to the sampling and analyses of soil samples for chemical parameters. As previously discussed, and as implemented for the Phase I investigation, analyses of soil samples for chemical parameters are not necessary or appropriate at the remedial design/remedial action stage of the Colbert Landfill project; the remedial action has been defined, and analytical data for soil is not required for implementation. Therefore, Spokane County does not propose to modify the QAPjP to include soil sampling and analyses for chemical parameters.

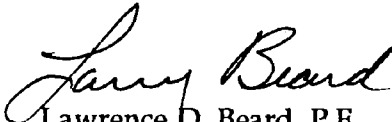
The planned approach for well construction, and subsequent sampling and analysis of groundwater samples, is essentially the same approach used during Phase I activities. As a result, Spokane County proposes that the Phase I QAPjP (subject to the corrective actions described in the Phase I Engineering Report) be used during Phase II well construction, if revisions to the Phase II QAPjP are not completed prior to the start of well construction activities.



Please inform Spokane County, by June 22, 1992, if delaying response to EPA and Ecology QAPjP comments until after NPDES issues are resolved is unacceptable, or if using the Phase I QAPjP for Phase II well construction is unacceptable. Please contact Dean Fowler (Spokane County) or myself if you have any questions.

LANDAU ASSOCIATES, INC.

By:

  
Lawrence D. Beard, P.E.  
Project Manager

LDB/sms

No. 124-001.71

06/04/92 COLBERT\PHASE-II\QAPjP.COM

cc: Dean Fowler, Spokane County  
Mike Kuntz, Washington State Department of Ecology  
Lyle Diedieker, Ecology and Environment, Inc.